#### IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

	§	
In re:	§	Case No. 16-31928
	§	
ENERGY XXI LTD, et al.,	§	(Chapter 11)
	§	
Debtors.	§	(Jointly Administered)
	§	

## NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF ALL PLEADINGS

PLEASE TAKE NOTICE that the undersigned hereby appears as counsel for Exxon Mobil Corporation ("ExxonMobil"), pursuant to Rules 2002, 3017(a), 9007, 9010 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and requests that copies of any and all notices, pleadings, motions, orders to show cause, applications, presentments, petitions, memoranda, affidavits, declarations, and orders, or other documents, filed or entered in this case, be transmitted to:

Charles A. Beckham, Jr.
Kelli S. Norfleet
HAYNES AND BOONE, LLP
1221 McKinney Street, Suite 2100
Houston, Texas 77010
Telephone No.: (713) 547-2000

Facsimile No.: (713) 547-2600 Email: charles.beckham@haynesboone.com Email: kelli.norfleet@haynesboone.com

PLEASE TAKE FURTHER NOTICE that this request includes not only the notices and papers referred to in the Bankruptcy Rules and title 11 of the United States Code (the "Bankruptcy Code"), but also includes orders and notices of any application, motion, petition, pleading, request, complaint, or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand-delivery, telephone, facsimile transmission, electronically, or otherwise, that: (1) affects or seeks to affect in any way the rights or interests of

ExxonMobil or any other party-in-interest in this case, including (a) property of the above-captioned debtors and debtors in possession (the "Debtors"), or proceeds thereof, (b) claims against, or interests in, the Debtors, (c) other rights or interests of creditors in the Debtors or other parties-in-interest in this case or (d) property or proceeds thereof in the possession, custody, or control of others that the Debtors may seek to use; or (2) requires or prohibits, or seeks to require or prohibit, any act, delivery of any property, payment or other conduct by ExxonMobil or any other party-in-interest.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance nor any prior or later appearance, pleading, claim, or suit shall waive any right of ExxonMobil to (a) have final orders in non-core matters entered only after de novo review by a District Court judge, (b) trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (c) have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (d) any other rights, claims, actions, defenses, setoffs or recoupments, under agreements, in law, in equity, or otherwise, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

DATED: April 14, 2016 Respectfully submitted,

### HAYNES AND BOONE, LLP

By: /s/ Charles A. Beckham, Jr.
Charles A. Beckham, Jr.
Texas State Bar No. 02016600
Kelli S. Norfleet
Texas State Bar No. 24070678
1221 McKinney, Suite 2100
Houston TX 77010

Telephone No.: (713) 547-2000 Facsimile No.: (713) 547-2600

Email: charles.beckham@haynesboone.com Email: kelli.norfleet@haynesboone.com

# COUNSEL FOR EXXON MOBIL CORPORATION

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing pleading was served by electronic mail via the Court's ECF system to all parties authorized to receive electronic notice in this case on April 14, 2016.

/s/ Charles A. Beckham, Jr.
Charles A. Beckham, Jr.